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Attorneys for MOAC Mall Holding LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	Chapter 11
)	
In re:)	Case No. 18-23538 (RDD)
)	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,)	(Jointly Administered)
)	
Debtors. ¹)	
)	
)	

MOTION OF THOMAS J. FLYNN, ESQ.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Thomas J. Flynn, Esq., request admission, *pro hac vice*, before the Honorable Judge Robert D. Drain, to represent MOAC Mall Holding LLC, a landlord in the above-referenced case.

I certify that I am a member in good standing of the bar of the State of Minnesota since 1978, the United States Court of Appeals for the Eighth Circuit since 1979 and the United States District Court for the District of Minnesota since 1978.

I have never been suspended or disbarred in any court and am of good moral character.

I have never been the subject of any disciplinary action by the bar or courts of any state.

I have never been denied admission to the courts of any state or to any federal court.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: New York, New York
November 21, 2018

Respectfully submitted,



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Attorneys for MOAC Mall Holding LLC

STATE OF MINNESOTA
IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

THOMAS J FLYNN

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 17, 1977

Given under my hand and seal of this court on

November 29, 2018

Emily J. Eschweiler

Emily J. Eschweiler, Director
Office of Lawyer Registration

